

EXHIBIT 29

B-Complaint CAP Cover Page

Kalamazoo Public Schools (39010) - December 2019

The RAP Team, as listed below has created the Corrective Action Plan and will assure that all responsible parties complete the tasks and activities and provide evidence of correction.

Name	Position	Date
Reuquiyah Saunders	Director of Special Education	12/20/2019
Janine VanStee	Coordinator of Special Education	12/20/2019
Nkenge Bergan	Director of Student Services	12/20/2019
Johnny Edwards	Director of Secondary Education	12/20/2019
Kevin Seale	School Psychologist - Secondary	12/20/2019

Required Compliance and Sanctions

Each activity in the Corrective Action Plan (CAP) is subject to and must be carried out in compliance with the procedural requirements of the IDEA and corresponding implementing federal regulations and state rules . In no event may the district leave its obligations toward these findings of noncompliance unresolved.

This CAP will remain open pending OSE and/or OGS/ECD&FE verification that the noncompliance has been corrected within the required timeline. The district is advised that the OSE and/or OGS/ECD&FE will maintain jurisdiction over the findings of noncompliance until the CAP is officially closed . Failure to correct the areas of noncompliance will result in enforcement actions by the State.

MDE CAP Clarification/Approval Comments

2/25/2020: Finding #2 needs correction. District refers to procedural safeguards as the documents given to parents. The complaint refers to the procedural safeguard protections afforded to students with an IEP or who are suspected of having a disability. Please make adjustments to finding #2 and resubmit.

2/25/2020

3/2/2020: (The district must revise or develop procedures regarding discipline, as needed, by 06/15/2020 to document and ensure that:

The District affords students the procedural safeguards contained in the IDEA's discipline provisions for students not determined eligible for special education.)

District activities for Finding #2 do not address procedures. {The district will review the meaning of this finding with the ISD monitor and our legal counsel.}

District needs to address Activities related to the complaint in Finding #2 and resubmit for approval.

New or revised procedures will need to be uploaded during the progress report due by 6/15/2020.

3/2/2020

3/2/2020: Activities in Finding #2 need to be addressed.

The activities need to address what the district will do to meet compliance. Please update the activities on Finding #2.

3/9/2020: CAP approved, on or before June 15th 2020, the district is required to complete the progress report

District CAP Clarification

The district will revisit and revise procedures it SWD discipline procedures and submit for approval.

3/2/2020

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which includes uploading the new/ revised
policy/procedures.

3/9/2020

MDE Verification/Closeout Comments

10/27/2020: Returned to ISD can update information on
verification appendix and worksheet.

10/27/2020

ISD Verification Clarification

Kalamazoo Public Schools (39010) - December 2019

Case Number: 19-0188

Complaint Findings:

The district is not in compliance with the IDEA and/or the MARSE regarding child find including:

- Not suspecting the Student might be a student with a disability and in need of special education.

1. Based on your RAP Team activities, what are the underlying problems that caused the noncompliance? How may district policies, procedures and practices, or the lack of supports, have contributed to these results?

The RAP Team Activities included reviewing the Child Student Team process and district staff handbook . In addition, the district drafted Child Find policies and provided training to all administrative leaders, special education ancillary staff and plan to train all building teams by the end 6/15/2020.

2. Required Corrective Action:

The district must revise or develop procedures regarding child find, as needed, by 06/15/2020 to document and ensure that:

- The District fulfills its ongoing Child Find obligation to identify , locate and evaluate students who are suspected of having a disability and in need of special education services.

The district must provide professional development by 06/15/2020 for all relevant staff regarding the new procedures . Evidence of change in the district's practices must be provided and verified by the OSE.

Evidence of the compensatory services ordered in the student level corrective action plan will be reviewed during the verification process.

3. Activity steps, dates they will occur, and name/title of person responsible:

	<u>Activity Steps</u>	<u>Date/Deadline(s)</u>	<u>Name/Title of Person Responsible</u>
1	Revised Child Find Procedures for the district to align with IDEA and OSE continued investigations in the district.	12/20/2019	Reuquiyah Saunders, Director of Special Education
2	Provided professional development on all new Child Find procedures to administrative staff and special education ancillary staff and building Child Study Teams.	6/15/2020	Reuquiyah Saunders, Director of Special Education

4. What documentation will your district have available as evidence that your tasks and activities were completed (e.g., meeting notes, agendas, new procedures)?

The district has the Child Find presentation, MDE Child Find Checklist(which is being review by district staff due to the vagueness of the probes), meeting agendas and new procedures.

5. How will the district monitor data on a monthly basis to determine that the tasks and activities listed in #3 have corrected the noncompliance (e.g., monthly data pulls, monthly record reviews)?

B-Complaint CAP Finding Page: Finding 1

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The district is review each building Child Study Team process monthly with the special education ancillary staff and building teams to determine the compliance for Child Find procedures.

If an assurance statement is required, please upload it here:

MDE Findings Comments

District Findings Clarification

Case Number: 19-0188

Complaint Findings:

The district is not in compliance with the IDEA and/or the MARSE regarding discipline including:

- Affording the Student the procedural safeguards contained in the IDEA's discipline provisions for students not determined eligible for special education.

1. Based on your RAP Team activities, what are the underlying problems that caused the noncompliance? How may district policies, procedures and practices, or the lack of supports, have contributed to these results?

The discipline procedures for SWD and students not yet eligible will be reviewed with all staff and students regarding procedural safeguards. Students that have Category III offenses will be give a copy of the procedural safeguards .

2. Required Corrective Action:

The district must revise or develop procedures regarding discipline, as needed, by 06/15/2020 to document and ensure that:

- The District affords students the procedural safeguards contained in the IDEA's discipline provisions for students not determined eligible for special education.

The district must provide professional development by 06/15/2020 for all relevant staff regarding the new procedures. Evidence of change in the district's practices must be provided and verified by the OSE.

Evidence of the compensatory services ordered in the student level corrective action plan will be reviewed during the verification process.

3. Activity steps, dates they will occur, and name/title of person responsible:

	<u>Activity Steps</u>	<u>Date/Deadline(s)</u>	<u>Name/Title of Person Responsible</u>
1	The district will review the meaning of this finding with the ISD monitor and our legal counsel.	6/15/2020	Reuquiyah Saunders, Director of Special Education,
2	The district will provide professional development to administrators and buildings teams regarding new discipline procedures and IDEA.	6/15/2020	Reuquiyah Saunders, Director of Special Education

4. What documentation will your district have available as evidence that your tasks and activities were completed (e.g., meeting notes, agendas, new procedures)?

A meeting notes and agendas regarding the finding of noncompliance .

5. How will the district monitor data on a monthly basis to determine that the tasks and activities listed in #3 have corrected the noncompliance (e.g., monthly data pulls, monthly record reviews)?

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Meeting will occur monthly with ISD monitor in order to train specific staff if any changes in procedure need to be made.

If an assurance statement is required, please upload it here:

MDE Findings Comments

District Findings Clarification